

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Legacy IMBDS, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10852 (KBO)

(Jointly Administered)

Hearing Date: Nov. 1, 2023, at 9:30 a.m. ET

IV MEDIA, LLC’S WITNESS AND EXHIBIT LIST

IV Media, LLC (“IVM”) submits this witness and exhibit list for the hearing scheduled for **November 1, 2023 at 9:30 a.m. (ET)** (the “**Hearing**”) before the Honorable Karen B. Owens, at the United States Bankruptcy Court for the District of Delaware.

WITNESSES

IVM designates the following persons as witnesses who may be called at the Hearing.

- (i) Cavitt Randall, Manager of IV Media, LLC
- (ii) Justin Smith, Senior Vice President of Content Acquisition, Comcast Cable Communications, LLC; and
- (iii) Any witness called by any other party.

EXHIBITS

IVM designates the following exhibits that may be used at the Hearing:

Exhibit Number	Document Description
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¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); iMedia Brands, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors’ service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

1	Affiliation and Distribution Agreement, dated as of March 1, 2009 (as subsequently modified and amended)
2	<i>Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [D.I. 93]</i>
3	<i>Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [D.I. 461]</i>
4	<i>Notice of Closing of Sale Transaction and Assumption an Assignment of Executory Contracts and Unexpired Leases [D.I. 467]</i>
5	<i>Declaration of Cavitt Randall [D.I. 642], filed under seal</i>
6	September 14, 2023 email from Jessica Gregory to Justin Smith, attached as Exhibit A to IVM's Objection [D.I. 642], filed under seal

IVM also cross designates all exhibits designated by any other party in connection with the Hearing and reserves the use additional exhibits for rebuttal or impeachment purposes. IVM reserves the right to amend or supplement this witness and exhibit list prior to the Hearing.

Dated: October 31, 2023
Wilmington, Delaware

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

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- and -

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